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Comments Regarding Bill #1131

AN ACT CONCERNING RENEWABLE ENERGY AND WEATHERIZATION

Before the Energy and Technology Committee

March 17, 2009

Prepared by Shirley Bergert¹

Section 1: Use a competitive process or designate assistance for distressed municipalities. This section proposes creation of a "green community pilot program." There should be a competitive process for determining which municipalities participate in the pilot if all municipalities are eligible to participate. A competitive process would challenge communities to develop a serious commitment, necessary for the pilot to demonstrate the potential of such a program. However, we recommend considering reconciling this section with Bill #1135, An Act Concerning Energy Efficiency in Underserved Communities, and focusing assistance on distressed municipalities which could most benefit by the cooperative effort envisioned.

Section 2: Cross subsidization by electric ratepayers for conservation of other fuels should be limited. This section proposes creation of an "energy efficiency improvement program." The program would be financed by electric ratepayers, but would be fuel blind. While fuel blind efficiency programs are likely to be the most effective efficiency efforts, they generally should be funded from the fuel sources where efficiencies are being developed or implemented. Otherwise electric ratepayers with the highest electric bills will pay disproportionately for conservation that offers limited or no benefit to them. This provision is very similar to Bill # 1132 and, if the committee decides to proceed with the concept, these will need to be reconciled.

Section 4: Support an effectively designed inclining block rate for electricity.

- Clear standards in this rate design need to be developed to ensure that it targets high users who can effect their energy consumption by making efficiency improvements. It is appropriate to exclude electric heat customers. Renters generally have no legal authority to make improvements in the rental property and may not be able to affect consumption. Low income households are currently struggling to pay for necessary utility service and they need protections when they cannot afford to make efficiency improvements to home-owned property and/or lack the legal right to make efficiency improvements in their rental property.
- The blocks and rates should be subject to approval of the DPUC, which this proposal does not provide for.
- The proposal needs a clearer articulation of how the funds to be transferred to the energy efficiency program are calculated; however it is logical and appropriate to use such funds for conservation.

Section 5: This section requires the Office of Policy and Management to develop a plan to use any federal stimulus funds to develop a weatherization program for

¹ Shirley Bergert serves: as the residential representative on the Energy Conservation Management Board overseeing the expenditure of ratepayer conservation funds in Connecticut Energy Efficiency Fund (Conn. Gen. Stat. § 16-245m); as the low income representative on the Fuel Oil Conservation Board (Conn. Gen. Stat. § 16a-22f); on the Low Income Energy Advisory Board (Conn. Gen. Stat. § 16a-41b); and on the Advisory Board of the Institute for Sustainable Energy at Eastern Connecticut State University.

residents who heat their homes with oil or gas and do not qualify for other weatherization programs.

- **It is unclear who is targeted for assistance.** Does "weatherization program" mean the program operated pursuant to a plan developed by the Department of Social Services for low-income households? Or does it refer to assistance available through the ECMB programs for residential customers, some of higher income? It makes sense to specify an income cap (e.g., 100% of State Median Income) to ensure the benefits are most effectively targeted to households least able to afford to make efficiency improvements without assistance. It is also important to specify what is intended by "residents who ... do not qualify for other weatherization programs." Virtually everyone qualifies for conservation assistance under some program for some purposes, though there is inadequate funding to meet all need. Is the intent to provide for fuel conservation measures when these programs do not address the fuel for which this new funding would be made available, or literally the household is ineligible or simply unable at the current time to access conservation assistance?
- **It is unclear why the funds are being run through OPM.** If the intent is to ensure fuel blind conservation assistance, it would be logical to coordinate this funding with conservation programs available for electric and gas measures, under the ECMB. The ECMB could be charged with developing fuel blind programs that integrate this funding and submitting a plan for approval to the DPUC or to the relevant legislative committees. If the desire is to make the programs truly fuel blind, then the benefits should not be limited to "oil or gas", but rather should be available for any deliverable fuel.